

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 11 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
JOHN R. WAGNER, M.D. FOR WAVE 11**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to John R. Wagner for Ethicon Wave 4, Dkt. 3617 (motion), Dkt. 3618 (memorandum in support) and Dkt. 3851 (reply brief) and Wave 6, Dkt. 4876 (motion), Dkt. 4879 (memorandum in support) and Dkt. 5044 (reply brief).

Plaintiffs respectfully request that the Court exclude John R. Wagner's testimony, for the reasons expressed in the Waves 4 and 6 briefing. This notice applies to the following Wave 11 cases identified in Exhibit A attached hereto.

Dated: August 8, 2019

Respectfully submitted,

/s/ D. Renee Baggett

Renee Baggett, Esq.

Bryan F. Aylstock, Esq.

Aylstock, Witkin, Kreis and Overholtz, PLC

17 East Main Street, Suite 200

Pensacola, Florida 32563

(850) 202-1010

(850) 916-7449 (fax)

E-mail: rbaggett@awkolaw.com

/s/ Thomas P. Cartmell

THOMAS P. CARTMELL

Wagstaff & Cartmell LLP

4740 Grand Avenue, Suite 300

Kansas City, MO 64112

816-701-1102

Fax 816-531-2372

tcartmell@wcllp.com

EXHIBIT A

Baldwin, Amanda Ann	2:12-cv-09515
Fernandez, Marta	2:15-cv-12757
Garver, Susanna B.	2:13-cv-29117
Olsen, Carol & William	2:13-cv-05877
Richards, Katrina M. & Brandon E.	2:13-cv-24539
Viola, Norma	2:13-cv-20017
Wagers, Carolyn	2:14-cv-10882

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
D. Renee Baggett
Aylstock, Witkin, Kreis and Overholtz, PLC
17 E. Main Street, Suite 200
Pensacola, FL 32563
850-202-1010
850-916-7449
Rbaggett@awkolaw.com